

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
FAIR HOUSING JUSTICE CENTER, INC.;  
PATRICIA DELONE-FELIX; STANLEY  
FELIX; BIANCA JONES; and ROSLYN  
SEALE,

Plaintiffs,

-against-

JUDA NIAYZOV; ALEVTINA IOFFE;  
EXCLUSIVE PROPERTIES REALTY, INC.;  
NDERIM DEMIROVIC; 202 MARINE LLC;  
XUEQIANG ZHENG; YU LI WENG; XIAN  
JIN ZHANG; and REMAX EDGE REALTY, LLC,

Defendants.

-----X  
Defendants JUDA NIAYZOV; ALEVTINA IOFFE; EXCLUSIVE PROPERTIES  
REALTY, INC.; (“Defendants”), by their attorneys of record, Sacco & Fillas, LLP, as and for their  
Answer to Defendants Xueqiang Zheng and Yu Li Weng’s Cross Claims (the “Cross Claims”),  
respectfully allege, upon information and belief, as follows:

**AS AND FOR A FIRST CROSS CLAIM**

1. Deny having knowledge or information sufficient to form a belief as to the truth or falsity of the allegations in paragraph “37” of the Cross Claims.
2. Deny the allegations in paragraph “38” of the Cross Claims.

**AS AND FOR A FIRST AFFIRMATIVE DEFENSE**

3. Answering Defendants responsibility for non-economic loss, if any, which is expressly denied herein, is less than 50% of any responsibility attributed to any tortfeasor, whether or not a party hereto, who is or may be responsible for the happening of Xueqiang Zheng and Yu Li Weng’s alleged injuries and, thus, such party is entitled to a limitation of damages

**AS AND FOR A SECOND AFFIRMATIVE DEFENSE**

4. Upon information and belief, Xueqiang Zheng and Yu Li Weng failed to mitigate damages.

**AS AND FOR A THIRD AFFIRMATIVE DEFENSE**

5. Xueqiang Zheng and Yu Li Weng's injuries, if any, were caused by the culpable conduct of parties other than the answering Defendants and over whom Defendants had no control.

**AS AND FOR A FOURTH AFFIRMATIVE DEFENSE**

6. This action is barred by the equitable doctrines of unclean hands, laches, estoppel and/or waiver because of Xueqiang Zheng and Yu Li Weng's own conduct, acts and/or omissions.

**AS AND FOR A FIFTH AFFIRMATIVE DEFENSE**

7. That the Cross Claims in their entirety, and each cause of action contained therein, lack the requisite specificity.

**AS AND FOR A SIXTH AFFIRMATIVE DEFENSE**

8. This action is barred, in whole or in part, by the applicable statute of limitations.

**AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE**

9. A defense is founded upon documentary evidence

**AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE**

10. That Defendant reserves the right to assert additional defenses if and to the extent that any such defenses are applicable.

**RESERVATION OF RIGHTS**

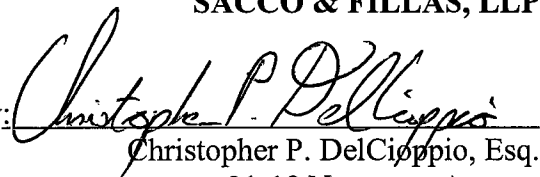
Defendants hereby reserve their right to bring any and all additional affirmative defenses and counterclaims that they may maintain against Xueqiang Zheng and Yu Li Weng, to the extent discovery in this action or further investigation reveals such further affirmative defenses and counterclaims.

**WHEREFORE**, Defendants respectfully request that this Court:

- A. Dismiss Xueqiang Zheng and Yu Li Weng's Cross Claims in their entirety, with prejudice;
- B. Deny each and every request for relief contained in Xueqiang Zheng and Yu Li Weng's Cross Claims;
- C. Award Defendants their reasonable attorneys' fees and costs of suit; and
- D. Award Defendants any such other and further relief this Court deems just and proper.

Dated: Astoria, New York  
January 27, 2025

**SACCO & FILLAS, LLP**

By:   
Christopher P. DelCioppo, Esq.  
31-19 Newtown Avenue  
Seventh Floor  
Astoria, New York 11102  
(718) 269-2220  
*Attorneys for Defendants*  
*Juda Niayzov, Alevtina Ioffe,*  
*Exclusive Properties Realty, Inc.*